

## South Arkansas Telephone Company

Your Link to the Telecommunications World™

February 12, 2018

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 28, 2018

South Arkansas Telephone Company – FCC 499 Filer ID: 802065

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, South Arkansas Telephone Company is filing the attached CPNI Certification, as well as a statement of procedures for operational compliance with the FCC's CPNI Rules.

Sincerely,

Greg Ashcraft

Secretary/Treasurer

Attachment

Copies:

4 copies to Secretary

1 copy via email to Best Copy and Printing

# SOUTH ARKANSAS TELEPHONE COMPANY P. O. BOX 778, Hampton, AR 71744 (870) 798-2201

# Annual 47 C.F.R. §64.2009 (e) CPNI Certification

### EB Docket 06-36

Annual 64.2009 (e) CPNI Certification for 2018

Date filed: February 12, 2018

Name of Companies Covered by this Certification:

499 Filer ID;

# South Arkansas Telephone Company

802065

I, Greg Ashcraft, certify that I am an officer of the company named above, and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commissions CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by any company at either state commissions, the court system, or at the Commission) against data brokers in 2017 and related to 2017. The Company is not aware of any attempts to pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained with the certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Sincerely,

Greg Ashcraft

Secretary/Treasurer

Attachments

#### SOUTH ARKANSAS TELEPHONE COMPANY

## South Arkansas Telephone Company, Inc. 499 Filer ID 802065

P. O. Box 778, Hampton, AR 71744 (870) 798-2201

# 2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE Due - February 28, 2018

This statement serves to explain how South Arkansas Telephone Company is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. § 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

#### 1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003 (g) and Section 222 (f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

#### 2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

#### 3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under Section 64.2005.

## 4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.